

February 28, 2008

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W. Suite TW-A325  
Washington, D.C. 20554

Reliance Globalcom Services, Inc.  
114 Sansome Street, 11<sup>th</sup> Floor  
San Francisco, CA 94104

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Re: **Reliance Globalcom Services, Inc. Certification of CPNI Filing EB Docket No. 06-36**

Dear Ms. Dortch:

Reliance Globalcom Services, Inc. ("Reliance Globalcom" or the "Company"), pursuant to the Public Notice issued by the Enforcement Bureau on January 30, 2006<sup>1</sup> and the Commission's rules requiring that all telecommunications carriers protect the privacy of customer proprietary network information ("CPNI"),<sup>2</sup> submits this Certificate and accompanying statement. Reliance Globalcom fully recognizes its responsibility to assure the confidentiality of its customers' CPNI. Reliance Globalcom has seen the media reports regarding release of subscriber information and shares the Commission's concern over such breaches.

Reliance Globalcom has long-standing policies to protect the confidentiality expectations of its customers, and has implemented operational procedures to protect the confidentiality of such information. Nonetheless, in light of media reports of CPNI releases from unrevealed sources, Reliance Globalcom is reviewing its procedures and is currently implementing a more comprehensive plan for protecting its customers' confidential information. When fully implemented, this plan will expand the Company's protections against inadvertent external release and will assure compliance as to Reliance Globalcom's own internal uses of the information. As part of this comprehensive plan, Reliance Globalcom has issued notices to its customers providing them additional opportunities to grant or deny Reliance Globalcom approval to use their CPNI.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

As required by the Public Notice, and consistent with the Commission's CPNI rules, the undersigned hereby states that he is an officer of Reliance Globalcom and makes this certification on the basis of personal knowledge; that the attached Compliance Statement accurately describes the operational procedures and policies implemented by Reliance Globalcom to ensure the privacy of its customers' CPNI; and that this Certificate and Compliance Statement are true and correct to the best of his knowledge, information and belief.

Respectfully submitted,



Howard Warner  
Vice President, Corporate Development  
Reliance Globalcom Services, Inc.  
Form 499 Filer ID: 823022

<sup>1</sup> *Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications*, WC Docket No. 05-196, Public Notice, DA 06-223 (rel. Jan. 30, 2006) ("Public Notice"); *Enforcement Bureau Provides Guidance on Filing of Annual Customer Proprietary Network Information (CPNI) Certifications Under 47 C.F.R. § 64.2009(e)* ("Public Notice").

<sup>2</sup> 47 C.F.R. §§ 64.2001 – 64.2009.

**COMPLIANCE STATEMENT ATTACHMENT TO CPNI  
CERTIFICATION OF HOWARD WARNER DATED FEBRUARY 29, 2007.**

**RELIANCE GLOBALCOM SERVICES, INC.**

**1. Disclosures of CPNI to Third Parties Prohibited**

Because Reliance Globalcom takes very seriously its obligation to protect against disclosure of CPNI, Reliance Globalcom does not disclose or provide access to CPNI to third parties that are not agents, independent contractors, or joint venture partners of Reliance Globalcom. Disclosure to agents, independent contractors or joint venture partners are made only after such entities or persons have executed a confidentiality agreement with Reliance Globalcom that includes provisions protecting the confidentiality of Reliance Globalcom's customer information. Specifically, the confidentiality provision prohibits contractors from disclosing or using, either during or after the term of their contract with Reliance Globalcom, any proprietary or confidential information of Reliance Globalcom's customers without Reliance Globalcom's prior written permission. The confidentiality provision further obligates the contractor to comply with all applicable laws and regulations. Breach of the confidentiality provision may result in termination of the contract at Reliance Globalcom's discretion.

**2. Review Process for Outbound Marketing Campaigns**

All outbound marketing campaigns fall under the supervisory purview of Reliance Globalcom's Vice President of Marketing, and are subject to review to ensure that all applicable laws and regulations are observed.

As of this time, Reliance Globalcom has not undertaken any marketing campaigns that incorporated the use of CPNI, except for Aggregate Information, as that term is defined in Section 222 of the Communications Act of 1934, as amended. The Company has engaged in marketing campaigns, but the contacts are not differentiated on the basis of the customer's billing information, service usage, or other CPNI.

Account representatives have access to their customers' usage information and are responsible for contacting those customers as usage approaches their port speed limitations. Those contacts, which involve selling services of the same type, do not require pre-approval by management.

**3. Employment at Reliance Globalcom is Contingent on Protecting Customer Confidential Information**

Maintaining the privacy of Customers' CPNI is a condition of employment at Reliance Globalcom.

All Reliance Globalcom employees are required to execute a confidentiality agreement in order to begin employment at Reliance Globalcom. This confidentiality agreement, among other things, requires employees to hold customer confidential information in the strictest confidentiality. This policy bars employees from disclosing such confidential information, and prohibits employees from removing confidential information upon conclusion of employment with Reliance Globalcom.

**4. Training**

Sales, Operations, Marketing and Accounting personnel receive training that includes their obligation to protect customer confidentiality. Reliance Globalcom management has planned additional training to be conducted for sales and marketing personnel early in 2008, with focus on the duty to protect CPNI from improper use, disclosure or access.

Reliance Globalcom is currently auditing the privacy protections it currently has in place. Concurrently with this audit, Reliance Globalcom is establishing more comprehensive CPNI protections. To that end, Reliance Globalcom will give all of its customers additional and ongoing opportunities to grant or deny Reliance Globalcom approval to use CPNI for marketing of communications related-services. Reliance Globalcom will continue to maintain and enforce its prohibition on releasing customer confidential information to third parties.